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JUL 10 1997

RCRA PERMITTING & COMPLIANCE BRANCH
(RPCB)

Lib

July 8, 1997

Mr. John Young, Director
Missouri Department of Natural Resources
Division of Environmental Quality
P.O. Box 176
Jefferson City, Mo. 65102-0176

Engineers • Architects
One Pine Ridge Plaza
8207 Melrose Drive
Lenexa, Kansas 66214-3621
Telephone (913) 492-0400
FAX (913) 894-1878
gba@gbutler.com
<http://www.gbutler.com>

RE: Final Partial Closure for the Surface Impoundment Plume Broski Brothers, Inc. (Broski) -
EPA ID#: MOT 300010972 Facility location: 39th & Belmont, Kansas City, Mo.

Ref:
July 15, 1996 MDNR letter
August 7, 1996 MDNR letter
November 22, 1996 GBA closure report(modification)
February 10, 1997 MDNR letter.

Dear John:

The forth quarter groundwater monitoring report and summery of four quarters analysis are enclosed. The results indicate a trend showing lower mobilization of metals in the groundwater that has migrated through the treated area, and satisfies that concern from your February 20, 1997 letter. Although the levels for metals in the groundwater have not achieved average background levels, a trend showing a positive effect of the treatment zone has been established by the closure modification. The groundwater results in the pit water (8/9/96 appendix 2 closure report) and well 210A (6/27/96 appendix 2 closure report) both monitoring areas on the input side of the treatment zone compared to the fourth quarter groundwater results for well 210 A2 (6/23/97) measuring the output of the zone verify this positive effect. Additionally, pH measurements universally indicate an upward or stable trend near background levels attesting to an effective and continuing neutralization of acid in the groundwater migrating through the treatment zone. We believe an analysis of this data demonstrates that after a year of treatment, progress toward remediation of the zone has been made and will continue as an effective treatment process. Also it should be noted the soil in this area is planned to be removed by the USACE for channel realignment (per your August 7, 1996, letter to USACE).

Based on the above we believe the modifications to the closure applied last year and measured for four quarters have been effective. Request final partial closure approval pursuant to 40 CFR 265.115. and subsequent release of the monies in the trust fund being held for post-closure care, your letter July, 15, 1996.



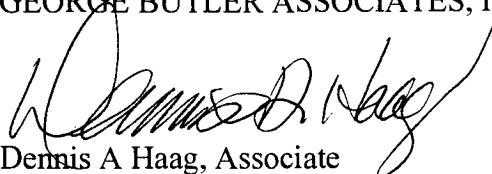
R00058912
RCRA Records Center

We further believe that the MDNR strategy and wise stewardship of this site through the closure process has been prudent, successful and protective of human health safety and the environment. As the sale of this property is eminent and beginning the rechanneling effort is based on the sale, request MDNR expedite final closure and release of the post closure trust funds.

If you have any questions please contact me at (913) 492-0400.

Best regards,

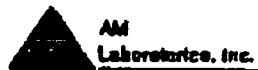
GEORGE BUTLER ASSOCIATES, INC



Dennis A Haag, Associate
Project Manager

Encl.

cc: Bob Stewart, P.E. U.S. EPA Region VII
Joe Lilley, USACE
Stan Broski
Paul Taylor



15130 B. South Kester • Olathe, KS 66063
Phone (913)825-0101 Fax (913)825-1181

RECEIVED

JUL 10 1997

Mr. Paul Taylor
Taylor Environmental, Inc.

RORA PERMITTING & COMPLIANCE BRANCH
(RPCB)

Client Project ID: Broaki Bros.
Chain of Custody #: 2289

Lab Project Number: 062397.02

201 A

Client Sample ID:	062397-1	Date Collected:	06/23/97
Lab Sample ID:	A1201	Date Received	06/23/97
Metals			
Analyte	Results	Units	Detection
Cadmium	0.035	mg/L	0.017
Chromium	0.040	mg/L	0.014
Lead	0.050	mg/L	0.050
Iron	1.041	mg/L	0.011
Manganese	0.419	mg/L	0.003
Zinc	0.120	mg/L	0.006
KEZ			Method
			6010

212

Client Sample ID:	062397-2	Date Collected:	06/23/97
Lab Sample ID:	A1202	Date Received	06/23/97
Metals			
Analyte	Results	Units	Detection
Cadmium	ND	mg/L	0.017
Chromium	0.021	mg/L	0.014
Lead	ND	mg/L	0.050
Iron	2.94	mg/L	0.011
Manganese	8.10	mg/L	0.003
Zinc	0.110	mg/L	0.006
KEZ			Method
			6010

212
Dup

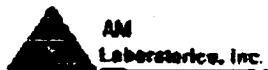
Client Sample ID:	062397-3	Date Collected:	06/23/97
Lab Sample ID:	A1203	Date Received	06/23/97
Metals			
Analyte	Results	Units	Detection
Cadmium	ND	mg/L	0.017
Chromium	ND	mg/L	0.014
Lead	ND	mg/L	0.050
Iron	0.865	mg/L	0.011
Manganese	10.3	mg/L	0.003
Zinc	0.049	mg/L	0.006
KEZ			Method
			6010

Blank

Client Sample ID:	062397-4	Date Collected:	06/23/97
Lab Sample ID:	A1204	Date Received	06/23/97
Metals			
Analyte	Results	Units	Detection
Cadmium	ND	mg/L	0.017
Chromium	ND	mg/L	0.014
Lead	ND	mg/L	0.050
Iron	0.135	mg/L	0.011
Manganese	0.150	mg/L	0.003
Zinc	0.046	mg/L	0.006
KEZ			Method
			6010

Reviewed By:

Page 2 of 4



15130 B South Keefer • Clackamas, OR 97015
Phone: (503) 653-0101 Fax: (503) 653-1331

Certificate of Analysis

Taylor Environmental, Inc.

Client Project ID: Broski Bros.
Chain of Custody #: 2289

Lab Project Number: 062397.02

R-210
A2
As-is

Client Sample ID:	062397-5	Date Collected:	06/23/97
Lab Sample ID:	A1205	Date Received	06/23/97
Metals			
Analyte	Results	Units	Detection
Cadmium	ND	mg/L	0.017
Chromium	ND	mg/L	0.014
Lead	ND	mg/L	0.050
Iron	16.0	mg/L	0.011
Manganese	21.9	mg/L	0.003
Zinc	46.8	mg/L	0.006
			Analyst
			Analyzed
			Method

209 A

Client Sample ID:	062397-6	Date Collected:	06/23/97
Lab Sample ID:	A1206	Date Received	06/23/97
Metals			
Analyte	Results	Units	Detection
Cadmium	ND	mg/L	0.017
Chromium	ND	mg/L	0.014
Lead	ND	mg/L	0.050
Iron	4.63	mg/L	0.011
Manganese	0.139	mg/L	0.003
Zinc	0.360	mg/L	0.006
			Analyst
			Analyzed
			Method

R-210
A2

Client Sample ID:	062397-7	Date Collected:	06/23/97
Lab Sample ID:	A1207	Date Received	06/23/97
Metals			
Analyte	Results	Units	Detection
Cadmium	ND	mg/L	0.017
Chromium	ND	mg/L	0.014
Lead	ND	mg/L	0.050
Iron	3.22	mg/L	0.011
Manganese	34.0	mg/L	0.003
Zinc	0.219	mg/L	0.006
			Analyst
			Analyzed
			Method

R-210
A1

Client Sample ID:	062397-8	Date Collected:	06/23/97
Lab Sample ID:	A1208	Date Received	06/23/97
Metals			
Analyte	Results	Units	Detection
Cadmium	0.050	mg/L	0.017
Chromium	0.050	mg/L	0.014
Lead	ND	mg/L	0.050
Iron	528	mg/L	0.011
Manganese	31.1	mg/L	0.003
Zinc	240	mg/L	0.006
			Analyst
			Analyzed
			Method

Reviewed By: 105

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TAYLOR ENVIRONMENTAL, INC.

Integrated Environmental Systems

Route 1, Box 48
Quitman, Missouri 64478

Telephone
816/725-4734

FIELD NOTES

Groundwater Monitoring System
Broski Bros. Surface Impoundment
39th and Belmont
Kansas City, MO 64129
EPA Id. Number MOT300010972

Fourth Quarter Groundwater Monitoring
Second Calendar Quarter

June 23, 1997

OWAB-201 A

Sample Identification Number 062397-1
Casing Diameter 2"
Depth to Water 9.28
Well Depth 22.72
Well Volume 2.20 gallons
Purge Volume 6.60 gallons
Volume Purged 7.00

Initial

Temperature	16.8
pH	6.19
Specific Conductance	890

At One (1) Well Volume

Temperature	14.7
pH	6.23
Specific Conductance	940

At Two (2) Well Volumes

Temperature	14.9
pH	6.36
Specific Conductance	950

At Three (3) Well Volumes

Temperature	14.4
pH	6.18
Specific Conductance	820

Sample

Temperature	15.3
pH	6.17
Specific Conductance	830

OWAB-209 A

Sample Identification Number 062397-6
Casing Diameter 2"
Depth to Water 17.95
Well Depth 22.68
Well Volume 0.77 gallons
Purge Volume 2.32 gallons
Volume Purged 1.50 (dry)

Initial

Temperature	18.0
pH	6.42
Specific Conductance	950

At One (1) Well Volume

Temperature	16.9
pH	6.46
Specific Conductance	980

At Two (2) Well Volumes

Temperature	16.3
pH	6.46
Specific Conductance	990

Sample

Temperature	18.5
pH	6.49
Specific Conductance	1010

R-210-A1

Sample Identification Number 062397-8

Casing Diameter 2"
Depth to Water 17.95
Well Depth 22.68
Well Volume 0.77 gallons
Purge Volume 2.32 gallons
Volume Purged 1.75 (dry)

Initial

Temperature	18.1
pH	5.84
Specific Conductance	3310

At One (1) Well Volume

Temperature	17.3
pH	5.80
Specific Conductance	3640

R-210-A1 (cont)

At Two (2) Well Volumes

Temperature	17.2
pH	5.37
Specific Conductance	3860

Sample

Temperature	17.6
pH	4.83
Specific Conductance	4660

R-210-2A

Sample Identification Number 062397-7

Casing Diameter 2"

Depth to Water 11.00

Well Depth 17.80

Well Volume 1.10 gallons

Purge Volume 3.33 gallons

Volume Purged 3.90 (dry)

Initial

Temperature	17.9
pH	6.45
Specific Conductance	3730

At One (1) Well Volume

Temperature	18.1
pH	6.51
Specific Conductance	3780

At Two (2) Well Volumes

Temperature	17.8
pH	6.56
Specific Conductance	3820

At Three (3) Well Volumes

Temperature	18.2
pH	6.51
Specific Conductance	3770

Sample

Temperature	17.4
pH	6.58
Specific Conductance	3820

OWAB-212 A

Sample Identification Number 062397-2
062397-3

Casing Diameter 2"
Depth to Water 21.69
Well Depth 29.23
Well Volume 1.23 gallons
Purge Volume 3.70 gallons
Volume Purged 4.00

Initial

Temperature 16.7
pH 6.26
Specific Conductance 1200

At One (1) Well Volume

Temperature 16.0
pH 6.29
Specific Conductance 1380

At Two (2) Well Volumes

Temperature 15.7
pH 6.30
Specific Conductance 1280

At Three (3) Well Volumes

Temperature 16.1
pH 6.40
Specific Conductance 1650

Sample

Temperature 17.5
pH 6.46
Specific Conductance 1470

Field Blank

Sample Identification Number 062397-4

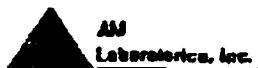
Temperature measured in degrees C

pH measured in S.U.

Specific Conductivity in umho/cm

Sample taken from well R210-A1 showed heavy sediment which could
effect the metal concentration analysis

Sample 062397-5 was taken from well R210-A1 prior to any water
removal



15130 E. South Kester • Olathe, KS 66212
Phone (913)229-4101 Fax (913)229-1181

Certificate of Analysis

Taylor Environmental, Inc.

Client Project ID: Broksi Bros.
Chain of Custody #: 2289

Lab Project Number: 062397.02

Quality Control

Method Blank

<u>Analyte</u>	<u>Result</u>	<u>Units</u>
All Metal Compounds	ND	mg/L

Matrix Spike/Matrix Spike Duplicate

<u>Analyte</u>	<u>Amt. In</u>	<u>Amt.</u>	<u>Amount</u>	<u>MS</u>	<u>Amount</u>	<u>MSD</u>	<u>%</u>
	<u>Original</u>	<u>Spiked</u>	<u>Found</u>	<u>% Rec.</u>	<u>Found</u>	<u>% Rec.</u>	<u>RPD</u>
Cadmium	ND	0.50	0.470	94.0	0.479	95.8	1.9
Chromium	ND	0.50	0.468	93.6	0.473	94.6	1.1
Lead	ND	0.50	0.462	92.4	0.498	99.6	7.5
Iron	1.28	0.50	1.74	92.0	1.84	72.0	24
Manganese	0.215	0.50	0.564	89.8	0.657	88.4	1.6
Zinc	0.383	0.50	0.837	90.8	0.831	89.6	1.3

Laboratory Control Sample

<u>Analyte</u>	<u>Amount Spiked</u>	<u>Amount Found</u>	<u>% Recovery</u>	<u>Control Limits</u>
Cadmium	0.50	0.447	89.4	70-120
Chromium	0.50	0.450	90.0	70-120
Lead	0.50	0.447	89.4	70-120
Iron	1.50	1.78	118	70-120
Manganese	0.50	0.596	119	70-120
Zinc	1.50	1.59	106	70-120

Reviewed By: Kay

Page 4 of 4

AM Laboratories, Inc.

2289

15130 B South Keeler • Olathe, KS 66062
Phone (913) 829-0101 • Fax (913) 829-1138

Page _____ of _____

Chain of Custody Record

Client Contact Name: Paul Taylor
Company Name: Taylor Environmental
Address: 1011 Park Ave
City, State, Zip: Quincy, IL 64878
Phone #: (816) 725-4734
Fax #: () _____

Project Name: Brasco Bros
Project Number: _____
Purchase Order Number: _____
Project Due Date: 6-25-97
Project Comments: _____
Sampler's Signature: John T. Johnson

Analyses/Methods to be Performed (check all that apply)

Relinquished By:		Date/Time:	4/22/97 3:16	Received By:		Date/Time:	4/23/97 1516
Relinquished By:		Date/Time:		Received By:		Date/Time:	

Defendant	Offender Code	Convict
<input type="checkbox"/> Defendant Person	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> None
<input type="checkbox"/> Convict	<input type="checkbox"/> Held	
<input type="checkbox"/> Alleged	<input type="checkbox"/> Detained	

TAYLOR ENVIRONMENTAL, INC.
Integrated Environmental Systems

Route 1, Box 48
 Quitman, Missouri 64478

Telephone
816/725-4734

GROUNDWATER MONITORING DATA
 Post Remediation Summary

Groundwater Monitoring System
 Broski Bros. Surface Impoundment
 39th and Belmont
 Kansas City, MO 64129
 EPA Id. Number MOT300010972

201 A

Date	Cd	Cr	Pb	Zinc	Mn	Iron	pH	Sp Con
09/27/96	<.01	<.05	0.007	0.12	0.69	3.52	6.41	815
12/11/96	<.017	<.014	<.057	<.006	0.856	0.578	6.35	875
03/20/97	<.017	<.014	<.057	0.059	0.488	0.400	6.37	820
06/23/97	0.035	0.040	0.050	0.120	0.419	1.041	6.17	830

209 A

Date	Cd	Cr	Pb	Zinc	Mn	Iron	pH	Sp Con
09/27/96	<.01	<.05	0.012	0.57	0.07	4.30	6.73	850
12/11/96	<.017	<.014	0.116	0.133	0.064	2.63	6.51	880
03/20/97	<.017	<.014	<.057	0.172	0.347	5.81	6.74	880
06/23/97	<.017	<.014	<.050	0.360	0.139	4.63	6.49	1010

R 210 A1

Date	Cd	Cr	Pb	Zinc	Mn	Iron	pH	Sp Con
09/27/96	0.17	<.05	0.009	360.	37.5	978.	3.60	5640
12/11/96	0.067	<.014	0.382	333.	27.0	394	4.67	6740
03/20/97	0.069	0.068	<.057	311	30.2	723	4.20	6140
06/23/97	0.050	0.050	<.050	240	31.1	528	4.83	4660
*	<.017	<.014	<.050	46.8	21.9	16.0	5.84	3340

R 210 A2

Date	Cd	Cr	Pb	Zinc	Mn	Iron	pH	Sp Con
10/14/96	0.02	<.05	<.01	0.08	2.95	1.13	6.79	3530
12/11/96	<.017	<.014	0.067	0.149	30.9	0.879	6.82	3770
03/20/97	<.017	<.014	<.057	0.103	27.9	2.66	6.78	3680
06/23/97	<.017	<.014	<.050	0.219	34.0	3.22	6.58	3820

212

Date	Cd	Cr	Pb	Zinc	Mn	Iron	pH	Sp Con
09/27/96	<.01	<.05	0.007	0.03	17.5	2.1	6.55	1020
12/11/96	<.017	<.014	0.177	ND	19.8	0.957	6.55	1180
03/20/97	<.017	<.014	<.057	0.035	18.2	0.905	6.53	1030
06/23/97	<.017	0.021	<.050	0.049	10.3	2.94	6.46	1470

* sample analysis of groundwater collected in well prior to purging